Worksheet Determination of NEPA Adequacy (DNA)

U.S. Department of the Interior Bureau of Land Management

Project Lead: Ryan Leary

Field Office: Sierra Front Field Office Lead Office: Sierra Front Field Office Case File/Project Number: N/A

NEPA NUMBER: DOI-BLM-NV-C020-2015-0011-DNA

Project Name: Temporary Change of Season of Use and Pasture Season of use on the Antelope

Allotment

Applicant Name: BLM

Project Location: Washoe County: Township 24N, Range 18E; Township 24N, Range 19E; Township 23N, Range 18E; Township 23N, Range 18E; Township 23N, Range 18E; Township

22N, Range 19E,

A. Description of the Proposed Action and any applicable mitigation measures:

The Proposed Action would:

Alter the season of use in all pastures on the Antelope Allotment for the duration of the drought plus one year as indicated in the table below.

Pasture	Permit Use	Proposed Use Start	Proposed Use End
2 South (Boot)	7/15 – 10/31	4/15/2015	5/18/2015
1 (7 Lakes/Bedell)	4/15 to 10/31	5/19/2015	7/30/2015
2 North (Sand Hills)	7/15 – 10/31	7/31/2015	8/30/2015
3 (Fred's Mountain)	6/1 – 10/31	8/31/2015	10/16/2015
4 Petersen (North)	7/15 – 10/31	No use due to lack of fencing	
4 Petersen (South)	7/15 – 10/31	10/17/2015	10/31/2015

The Sierra Front Field Office (SFFO) managed lands as a whole are currently in severe drought conditions as defined by the U.S. Drought Monitor. The changes the pasture season of use are being undertaken as a precaution. These drought management actions were analyzed in the Carson City District Drought Management Environmental Assessment (DOI-BLM-NV-C000-2013-0001-EA) (Drought EA).

Temporary Change in Season of Use.

The permitted pasture rotation and pasture season of use are not the optimum under drought conditions. The crested wheatgrass seeding in Pasture 2 South would be better utilized in April

while it is green and soft instead of July when it is drier and less palatable to cattle. The current rotation staggers and rotates spring use but continues use in all pastures through the end of October. Under drought conditions, resources would be better protected with discrete periods of use rather than all pastures utilized through the end of October.

B. Land Use Plan (LUP) Conformance

The Proposed Action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decisions:

Consolidated Resource Management Plan (May 2001): LSG - 1

- Maintain or improve the condition of the public rangelands to enhance productivity for all rangeland and watershed values;
- Provide adequate, high quality forage for livestock by improving rangeland condition;
- Maintain a sufficient quality and diversity of habitat and forage for livestock, wildlife, and wild horses through natural regeneration and/or vegetation manipulation methods;
- Improve the vegetation resource and range condition by providing for the physiological needs of the key plant species; and
- Reduce soil erosion and enhance watershed values by increasing ground cover and litter.

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

Carson City District (CCD) Drought Management Environmental Assessment (Drought EA) (DOI-BLM-NV-C000-2013-0001-EA). The Finding of No Significant Impact statement was dated July 2, 2013.

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

Yes. The Proposed Action is to implement the Drought Response Actions (DRA) described in the CCD Drought Management Plan (Appendix 3 of the CCD Drought EA) "C. Temporary Change in Season of Use".

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

Yes, the current environmental concerns, interests and resource values are the same as analyzed in the CCD Drought EA. Change in season of use for the duration of the drought plus one growing season to allow for resource protection is one of the DRA described in the CDD Drought Management Plan (Appendix 3 of the CCD Drought EA) and analyzed in CCD Drought EA (page 8). The range of alternatives analyzed in the existing NEPA document for responding to drought conditions remains appropriate with respect to the current Proposed Action.

Since the completion of CCD Drought EA in 2013, there are no new environmental concerns, interests, resource values or circumstances that have been introduced that would require additional analysis to be conducted in the area.

3. Is the existing analysis valid in light of any new information or circumstances (such as, range- land health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Yes. The existing analysis covers the current drought conditions that have been documented. Change in season of use is one of the DRAs described in the Proposed Action of the CCD Drought Management Plan (Appendix 3 of the CCD Drought EA) and analyzed in the CCD Drought EA (page 8). According to the U.S. Drought Monitor, the drought is forecasted to persist across northern Nevada. Given the continuation of the drought, the BLM can reasonably conclude that new information and new circumstances would not substantially change the analysis of the potential impacts of the Proposed Action.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Yes. The direct, indirect, and cumulative effects for the Proposed Action are identical to those identified in the CCD Drought EA. The CCD Drought EA sufficiently analyzed all affected resources related to implementing one or more drought response actions.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Yes. The public involvement and interagency review associated with CCD Drought EA is adequate for the Proposed Action. Comments were accepted on the CCD Drought EA for a 30-day period from March 12, 2013 through April 12, 2013. Postcards mailed to 147 individuals, organizations and agencies were mailed on March 12, 2013. Emails were sent to 10 individuals, organizations and agencies, and notification of the availability of the CCD Drought EA was sent to 61 other State and federal agencies was made through the Nevada State Clearinghouse on March 14, 2013. The CCD published a news release on March 12, 2013. The CCD also posted the Dear Reader Letter and CCD Drought EA on the project website on March 12, 2013. On March 20, 2013 a BLM representative attended both the Churchill County and Mineral County Commissioners meeting and informed the Commissioners and other attendees that the CCD Drought EA was out for public review. The representative also provided five hard copies of the CCD Drought EA and 20 postcards at each of the meetings for the Commissioners and others.

All comments were reviewed, considered, and then categorized into topics when feasible. Distinct topics and comments are summarized in Appendix 7 of the CCD Drought EA. During the comment period approximately 6,950 comment letters and emails were received from numerous individuals, State agencies, and non-governmental organizations by email, fax or mail. Organizations included the Sierra Club, the Cloud Foundation, and the American Wild Horse Preservation Campaign. State agencies that commented include the Nevada Division of Water Resources, the State Historic Preservation Officer, the Nevada State Grazing Board District N-3,

and the Nevada Department of Wildlife. Minor non-substantive changes were made to the EA as a result of these comment letters.

	Ε.	Persons	Agenci	ies/BL	M S	Staff	Consulted
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attached proposed decision.)

2. I ersons//igeneres/DEI/I Start	Sonsuited	
Name	Title	Resource/Agency Represented
Brian Buttazoni	NEPA Compliance	BLM
		2-2013-0001-EA) for a complete list coriginal environmental analysis or
Conclusion: Based on the review of the applicable land use plan and the and constitutes BLM's compliance	at the NEPA documentation	clude that this proposal conforms to ion fully covers the proposed action the NEPA.
Q. B. Lean		
Signature of Project Lead		
B Drutay >		
Signature of NEPA Coordinator		
Leon Thomas Field Manager Sierra Front Field Office		
Date 12-3-14		
Does this DNA constitute the decis	ion document for this Pro	posed Action? □Yes ⊠ No (see